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 8 **UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
 9

10 ALLEN MUNRO *et al.*,  
 11 *Plaintiffs,*  
 12 v.  
 13 UNIVERSITY OF SOUTHERN  
 CALIFORNIA, *et al.*,  
 14 *Defendants.*

Case No. 2:16-cv-06191-VAP-E  
**DECLARATION OF JANE A. SINGLETON**  
 DATE: August 14, 2023  
 TIME: 2:00 p.m.  
 Courtroom 6A  
 Hon. Virginia A. Phillips

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1 I, Jane A. Singleton, declare as follows:

2 1. I am a named Plaintiff and Class Representative in this case.

3 2. I was employed by the University of Southern California from 1964-2015  
4 and I participate in the University of Southern California Defined Contribution Plan  
5 and the University of Southern California Tax-Deferred Annuity Plan.

6 3. When this case was filed, on August 17, 2016, I had retired from USC but  
7 accepted the risk of alienation from USC or its officers.

8 4. I have been an active participant throughout this litigation and have dedicated  
9 significant time to the prosecution of this lawsuit. My attorneys sent me the case  
10 documents which I reviewed, and they also discussed with me the status of the case  
11 and issues regarding the case throughout these six years of litigation. I also  
12 searched my own documents in preparing responses for Rule 26 disclosures and  
13 responses to 19 interrogatories and 30 requests for production of documents. I  
14 gave my deposition in this case over 4.5 hours and prepared for that deposition for  
15 approximately 3.5 hours. Additionally, I was prepared to testify at trial and  
16 prepared for that testimony with my attorneys for approximately two hours. I  
17 estimate that I spent 20-30 hours over the six years plus this case has been pending  
18 in these activities.

19 I declare under penalty of perjury that the foregoing is true and correct.

20 Executed: Jun 29, 2023

21 Jane A. Singleton  
22 Jane A. Singleton (Jun 29, 2023 21:52 EDT)  
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24 Jane A. Singleton

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